

### **REMARKS/DISCUSSION OF ISSUES**

By this Amendment, Applicants cancel claims 6 and 20, and amends claims 1-5, 7-19 and 21-28. Accordingly, claims 1-5, 7-19 and 21-28 are pending in the application.

Applicants thank the Examiner for acknowledging the claim for priority and receipt of certified copies of all the priority documents, and the acceptance of the drawings.

Reexamination and reconsideration are respectfully requested in view of the following Remarks.

### **CLAIM OBJECTIONS**

The Office Action objects to claims 2-14, 16-26 and 28 on various grounds.

By this Amendment, Applicants amend claims 2-14, 16-26 and 28 and respectfully submit that all objections have been addressed.

Accordingly, Applicants respectfully request that the claim objections be withdrawn.

### **35 U.S.C. § 103**

The Office Action rejects all of the pending claims 2-14, 16-26 and 28 under 35 U.S.C. § 103 over Shepherd et al. WIPO Publication WO 01/31960 ("Shepherd") in view of Iliadis U.S. Patent 6,968,157 ("Iliadis").

Applicants respectfully submit that all of the pending claims are patentable over Shepherd and Iliadis for at least the following reasons.

#### **Claim 1**

Claim 1 has been rewritten to include the features of the original claim 6, and corresponds in scope identically to the originally-filed claim 6.

Among other things, the method of claim 1 includes timing the transmission of the first signal to interfere with at least a portion of a transmission made by the radio terminal in accordance with the first predetermined signalling protocol.

Applicants respectfully submit that no combination of Shepherd and Iliadis would produce a method including such a feature.

The Office Action states that Shepherd discloses such a feature in FIGs. 1 and 2 and at page 7, lines 1-10.

Applicants respectfully disagree.

FIG. 1 of Shepherd merely shows two laptop computers.

FIG. 2 of Shepherd shows a sequence diagram of signals being transmitted back and forth between a First Unit 3 and a Second Unit 4 to synchronize the two units so that they may exchange data. None of the signals in the sequence is timed such that its transmission interferes with any portion of any other signal in the sequence.

Page 7, lines 1-10 of Shepherd describes the synchronization process illustrated in FIG. 2. In the sequence, none of the signals is timed such that its transmission interferes with any portion of any other signal in the sequence.

Therefore, none of the cited portions of Shepherd discloses any method wherein the transmission of a first signal is timed to interfere with at least a portion of a transmission made by a radio terminal. Indeed, Applicants see nothing anywhere in Shepherd that discloses such a feature.

Accordingly, for at least these reasons, Applicants respectfully submit that claim 1 is patentable over the cited art.

Claims 2-5 and 7-14

Claims 2-5 and 7-14 depend variously from claim 1 and are deemed patentable for at least the reasons set forth above with respect to claim 1.

Claim 15

Claim 15 has been rewritten to include the features of the original claim 20, and corresponds in scope identically to the originally-filed claim 20.

Among other things, in the policing terminal of claim 15 the means for transmitting the first signal matched to a characteristic of the first predetermined signalling protocol is adapted to transmit the first signal concurrently with at least a

portion of a transmission made by the radio terminal in accordance with the first predetermined signalling protocol.

As explained above with respect to claim 1, no combination of Shepherd and Iliadis would produce a policing terminal including such a combination of features.

Accordingly, for at least these reasons, Applicants respectfully submit that claim 15 is patentable over the cited prior art.

Claims 16-19 and 21-28

Claims 16-19 and 21-28 depend variously from claim 15 and are deemed patentable for at least the reasons set forth above with respect to claim 15.

**CONCLUSION**

In view of the foregoing explanations, Applicants respectfully request that the Examiner reconsider and reexamine the present application, allow claims 1-5, 7-19 and 21-28, and pass the application to issue. In the event that there are any outstanding matters remaining in the present application, the Examiner is invited to contact Kenneth D. Springer (Reg. No. 39,843) at (571) 283.0720 to discuss these matters.

Respectfully submitted,

VOLENTINE & WHITT

By: 

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Kenneth D. Springer  
Registration No. 39,843

VOLENTINE & WHITT  
One Freedom Square  
11951 Freedom Drive, Suite 1260  
Reston, Virginia 20190  
Telephone No.: (571) 283.0724  
Facsimile No.: (571) 283.0740